

**Quendall Terminals Superfund Site
Expansion of I-405 and Railroad Area Work**

EPA Region 10, Seattle
February 24, 2017 – 10 am

Attendees

Claire Hong, EPA Region 10
Ted Yackulic, EPA Region 10
Rene Fuentes, EPA Region 10
Kira Lynch, EPA Region 10 (phone)
Kay Morrison, EPA Region 10
Susan Moore, CH2M (Consultant for EPA)
Tim Flynn, Aspect (Consultant for Altino)
Lynn Manolopoulos, DWT (Counsel for Altino)
Jim Benedict, Cable Huston (Counsel for Baxter)
(phone)
Shane DeGross, BNSF Railway
Brooke Kuhl, BNSF Railway
Matthew Wells, Tupper Mack Wells (Counsel for BNSF)
Cailin Hunsaker, City of Renton
William Blakney, King County (Counsel for King County)
Erica Jacobs, King County
Harry Grant, Riddell Williams (Counsel for PSE)
Courtney Seim, Summit Law Group (Counsel for PSE)

Lisa Hodgson, WSDOT/405
Caroline Barnett, (Consultant for WSDOT on 405 design)
Ross Fenton, (Consultant for WSDOT on 405 design)
Deborah Cade, WA State Attorney General (phone)
Vicki Grover, City of Renton
Charles Thomas, BNSF (Director of Environmental
Remediation (phone)

Invitees Not in Attendance

Robert Cugini, Altino Properties
Georgia H. Baxter, J.H. Baxter
Allen Stegman, BNSF Railway
Jennifer Henning, Planning Manager, City of Renton
Shane Moloney, Counsel for City of Renton
Larry Warren, City of Renton Attorney
Kristie Elliot, King County
Tri Ong, King County
Jason Foust, WA State Attorney General

Meeting presentation materials are available at:

<https://ch2m.box.com/s/hni8twfxntvh8ye14xm7du1rxsc6eqig>

ITEMS DISCUSSED

Visible and subsurface contamination in Railroad Road (RR) Area – EPA

Claire Hong/EPA Region 10 described the Quendall Terminals Superfund Site and the need to integrate the various proposed actions by Washington State Department of Transportation (WSDOT) and King County to prevent long-term issues in and around the RR Area. Ms. Hong showed maps and photo indicating EPA's concern with surface and subsurface contamination in the RR Area. She noted that while EPA was seeking action from King County to prevent surface exposure, EPA also became aware of WSDOT's plans for potentially covering contamination in the area as well. The proposed WSDOT action to raise the intersection is of concern to EPA because if tons of highway construction material are added as part of the construction, it would inhibit EPA's ability to characterize and address the potential contamination source material in that area, especially at depth. Ted Yackulic/EPA Region 10 noted that the deeper contamination is of concern because it is a continuing contamination source to the lake (contaminated groundwater from the site discharging to Lake Washington). He noted that if a construction project is planned in an area above deeper sources of contamination, the area needs to be characterized first, to determine whether an "interim action" is necessary (i.e., cleanup before construction).

Description of I-405 Expansion with a focus on impact areas in RR Area – WSDOT

Ross Fenton/WSDOT described the upcoming I-405 expansion project that includes adding an express toll lane in southern portion of I-405 between Bellevue and Renton. He showed several slides depicting the proposed changes to the 44th Street interchange. He noted that fill will be placed in the area east of

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N. 43rd Street (entrance to Barbee Mills) to provide 12 to 15 feet of additional height to support the new configuration of Lake Washington Boulevard in that area. They are also planning to raise the grade of Seahawks Way (directly east of the Virginia Mason Athletic Center [VMAC]), ranging in height from 3 to 5 feet. Red lines on 405-Quendall_Exhibit-1B_Detail_02-23-2017.pdf (available on link provided above) depict the areas where the grades will be changed and fill will be added. He noted that the cross-section (405-Quendall_Exhibit-2B_Detail_02-23-2017.pdf) shows a good example of fill depth. The cross-section also shows the documented location of the King County Sanitary Sewer Eastside Interceptor (86-inch-diameter). Mr. Fenton said this was depicted using as-built drawings only (no field verification).

Mr. Fenton noted that the interchange project would be completed using a design-build contract. WSDOT will complete a 15 to 30 percent design, and the design-builder will finish the design and do the construction. Mr. Fenton indicated that the request for proposal (RFP) would be ready for distribution to design-build firms by the fall of 2018, and the plan would be to award the contract for design in the summer of 2019, begin construction in 2020, and complete construction by 2024.

Mr. Fenton also discussed WSDOT's proposed sampling plan indicating that it included characterization (to 15 feet) of two areas: The southern area (A) on the City of Renton right-of-way and the northern area (B), not connected to Quendall, but part of the same parcel.

Description of Current and Future Actions in the RR Area – King County

Erica Jacobs/King County Parks presented the County's plan for a permanent, paved, non-motorized trail to replace the rails from Bellevue to Coulon Park in Renton (known as the Lakefront section). Ms. Jacobs presented the County's proposed scope for the rail removal and capping near the Quendall Site (King County Proposed Scope_Interim Capping_Quendall Terminals.pdf). The work includes removal of rails, placement of geotextile for a width of 10 feet over the centerline of the former rail line, placement of 6 to 9 inches of surface gravel, and installation of a chain link fence along both sides of the 10-foot wide area to prevent public access to the non-capped areas of the property. Ms. Jacobs indicated that the gravel in the area north of the VMAC through the area adjacent to the Quendall Site would remain until after cleanup action, and that there would be no surface street alteration.

Ms. Jacobs noted that the County anticipated the bid advertisement in April 2017, with construction to occur during the 2nd and 3rd quarters of 2017, and community outreach to occur the 1st quarter of 2017.

Interchange Sampling Plan Discussion – EPA

Ms. Hong noted that participants have access to the WSDOT Sampling and Analysis Plan (SAP), EPA's SAP for previous work at the Quendall Site, and EPA's proposed data needs for the upcoming work (available at the link above). EPA's presentation included maps showing grids over the areas proposed to be characterized by WSDOT. Discussion ensued about the density and spacing of sampling points.

Lisa Hodgson/WSDOT asked whether "this level of investigation" is what EPA would do in this area. Ms. Hong said yes, adding that the strategy would be to place deeper and more tightly spaced borings closer to the known contamination. She also noted concerns about carrying contamination down into the deeper materials where contamination affects groundwater that discharges to the lake.

Actions in the Interchange Area – EPA

Ted Yackulic/EPA Region 10 began by noting that the interchange project is going forward on a timeline that is faster than EPA's project. He noted that EPA expects a Record of Decision (ROD) in 2019. He described the process that would be taken following the ROD, noting that it would take at least one additional year before remedial design (RD) and additional characterization would begin. The process

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following the ROD (before RD) would include identifying potentially responsible parties (PRPs), issuing notices and negotiating with PRPs, lodging consent decrees (CDs) with the court, noting that additional time would be needed as well, for the CDs to become effective. He noted that the remedy in this area will solidify or remove source material, and characterization of contamination in this area is needed to know whether an action needs to be taken or not – before it is buried under a freeway project.

A lengthy discussion ensued regarding the authorities under which the characterization work could be enforced and the nature and timing of the characterization work required by EPA. The following bullets capture the main points of the discussion:

- EPA encouraged WSDOT to undertake the characterization work to determine whether action is needed, noting that EPA could also perform the characterization or order performance. He also noted that those costs may be recovered from WSDOT.
- If action is warranted, EPA noted it would likely be considered a time-critical removal action (TCRA), which is a more streamlined process than standard cleanup process used at National Priorities List (NPL) sites.
- EPA verified that the characterization work in this area would be needed regardless of whether the WSDOT project was constructed or not, but also noted that absent the WSDOT project, the data would likely be collected during RD.
- WSDOT asked about whether the area could be capped. EPA noted that capping is done at some sites, but is not appropriate for the Quendall site due to (1) the mobility potential of the source material, and (2) how the source material contributes to groundwater contamination.
- WSDOT asked whether it would be reasonable to assume the area could be characterized and a remedial plan developed by 2019. EPA indicated it could, but would depend on the site of the area that needed remedial action. When asked for input on timing needed for the characterization fieldwork, Tim Flynn/Aspect offered that it would depend on the number of borings, but that it would be reasonable to assume 3 borings could be completed each day. He noted that at least 6 months would likely be needed for planning document development and review by EPA.

WRAP UP

Mr. Yackulic noted that EPA is not pressing for a decision from WSDOT. WSDOT responded that they will process what they heard in the meeting today and will get in touch with EPA with a response within the next couple of weeks. WSDOT also indicated that it may contact EPA with additional questions before it responds.

Ms. Hong noted that she would upload all of today's meeting materials and presentations to the website and re-send the link (it also included on p. 1 of these notes).